

Re: Organic Food definition

Eileen Stommes, Deputy Administrator

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To Whom It May Concern:

The California regulations for "organic" are the highest and most complete in the country. People and farmers who believe in the concept of organic products have created a definition that is worthy and complete. The proposed changes in these regulations by the Federal Government do not take into account the meaning of the word organic.

I strongly reject the notion of including sewer sludge (preamble and section 205.22), irradiation (preamble and section 205.17) and genetically engineered organisms and their derivatives (preamble and section 205.8, 205.0, 205.16, 205.22, 205.26) as acceptable in a label called organic. These inclusions also seems to lead the way for approval of chemically treated seeds, botanical pesticides, antibiotics and some hormones for livestock, and restricted space for livestock (preamble and section 205.15(b)) which I also find offensive. These inclusions make a mockery of the whole concept of healthy vitamin rich pesticide and chemical free products now labeled "organic".

In all products, there are levels of quality. If you change organic to mean the above you eliminate the highest quality of food and livestock in the country. In addition, without a fee structure, the smaller organic certifiers will be driven out of business (section 205.421). I am sure this is not your intent. It is important to maintain an atmosphere of fair competition in this country in the food business. I would encourage you to truthfully look at the existing California Regulations for the definition of organic and adopt them, as well as a fair-minded fee structure.

Please maintain a food source in this country that measures up to the true definition of organic.

Thank you for your consideration to this matter.

Sincerely,